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11 Attorneys for Defendant-Intervenors
12 (Admitted *Pro Hac Vice*)

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**
15 **(Northern Division)**

16 SIERRA TRAIL DOGS MOTORCYCLE
AND RECREATION CLUB; PINE NUT
17 MOUNTAINS TRAILS ASSOCIATION;
18 AMERICAN MOTORCYCLIST
ASSOCIATION, DISTRICT 36;
19 CALIFORNIA FOUR WHEEL DRIVE
ASSOCIATION and THE BLUE RIBBON
20 COALITION,

21 Plaintiffs,

22 v.

23 UNITED STATES FOREST SERVICE;
24 HUMBOLDT TOIYABE NATIONAL
FOREST; WILLIAM ("BILL")
25 DUNKELBERGER, Forest Supervisor,
26 Humboldt-Toiyabe National Forest,

27 Defendants,

28 and

Case No. 3:18-cv-594-MMD-CLB

**STIPULATION TO EXTEND BRIEFING
SCHEDULE FOR REPLIES TO CROSS-
MOTIONS FOR SUMMARY JUDGMENT**

(First Request)

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AMERICAN BIRD CONSERVANCY;
CENTER FOR BIOLOGICAL DIVERSITY;
WESTERN WATERSHEDS PROJECT;
WILDEARTH GUARDIANS,

Defendant-Intervenors.

1 Under Local Rule 6-1, Plaintiffs Sierra Trail Dogs Motorcycle and Recreation Club; Pine
2 Nut Mountains Trail Association; American Motorcyclist Association, District 36; California Four
3 Wheel Drive Association; and the Blue Ribbon Coalition; Federal Defendants United States Forest
4 Service; Humboldt Toiyabe National Forest; and William (“Bill”) Dunkelberger, Forest
5 Supervisor, Humboldt-Toiyabe National Forest; and Defendant-Intervenors American Bird
6 Conservancy, Center for Biological Diversity, Western Watersheds Project, and WildEarth
7 Guardians hereby stipulate to extend the remaining briefing deadlines for their motion and cross-
8 motions for summary judgment. This is the first such stipulation for extension of time.

9 The Plaintiffs filed their motion for summary judgment on September 20, 2019. ECF
10 No. 31. The Federal Defendants filed their cross-motion and their response in opposition to the
11 Plaintiffs’ motion on November 1, 2019. ECF No. 37. The Defendant-Intervenors filed their
12 cross-motion and their response in opposition to the Plaintiffs’ motion on November 8, 2019.
13 ECF Nos. 40-41.

14 Under the current briefing schedule for the cross-motions, ECF No. 27, the Plaintiffs’
15 response/reply brief is due by December 6, 2019; the Federal Defendants’ reply brief is due 28
16 days from the filing of the Plaintiffs’ response/reply brief, which would be January 3, 2020, at the
17 latest; and the Defendant-Intervenors’ reply brief is due 7 days from the filing of the Federal
18 Defendants’ reply brief, which would be January 10, 2020, at the latest.

19 The parties request an extension of these three upcoming briefing deadlines in the interests
20 of justice. The current briefing schedule spans the Thanksgiving and Christmas holidays, during
21 which time preparing the reply briefs will be difficult due to conflicting work and personal
22 commitments. Additionally, the Defendant-Intervenors’ lead counsel are from the Stanford
23 Environmental Law Clinic, a teaching clinic at Stanford Law School where student practitioners
24 work under the supervision of licensed attorneys. The winter academic quarter for the law
25 school’s 2020-2021 school year will not begin until January 6, 2020, at which time a new set of
26 students will be working in the clinic. An extension of the due date for the Defendant-Intervenors’
27 reply brief would permit these new students to prepare the reply brief.

1 The parties therefore stipulate that, with the Court's permission, the following deadlines
2 will supersede the deadlines established in by the previous briefing schedule in ECF No. 27:

- 3 • Plaintiffs' Combined Response/Reply Brief is due on or before December 20, 2019.
- 4 • Federal Defendants' Reply Brief is due on or before January 31, 2020.
- 5 • Proposed Intervenor-Defendants' Reply Brief is due on or before February 7, 2020.

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7 Respectfully submitted this 15th day of November, 2019.

8 /s/ Deborah A. Sivas

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10 Mills Legal Clinic at Stanford Law School

11 /s/ Paul Ruprecht

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13 Attorneys for Defendant-Intervenors

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16 /s/ Paul A. Turcke

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20 Jean E. Williams
Deputy Assistant Attorney General
21 Environment & Natural Resources Division

22 /s/ Shaun M. Pettigrew

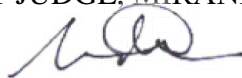
23 Shaun M. Pettigrew
Trial Attorney
24 Natural Resources Section

25 Attorneys for Federal Defendants

26 IT IS SO ORDERED:

27 UNITED STATES DISTRICT JUDGE, MIRANDA M. DU

28 DATED: November 18, 2019



CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2019, I electronically transmitted the foregoing to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all CM/ECF registrants for this matter.

/s/ Deborah A. Sivas

Deborah A. Sivas